PS Docket № 07-114

Before the Federal Communications Commission

IN RE

WIRELESS E911 LOCATION ACCURACY REQUIREMENTS

ON PUBLIC NOTICE

REPLY COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION

TELFORD E. FORGETY, III
Attorney
Government Affairs Director

1700 Diagonal Road, Ste. 500
Alexandria, VA 22314
(202) 618-6369

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NENA: The 9-1-1 Association respectfully submits the following reply to Comments filed in response to the *Public Notice* concerning "Wireless Carriers' Privacy and Security Plan for the National Emergency Address Database" released by the Public Safety and Homeland Security Bureau on February 28th, 2017, in the above-captioned proceeding.

REPLY

NENA is pleased that the wireless carriers' required Privacy and Security Plan for the National Emergency Address Database (NEAD) has drawn widespread support. Privacy and security are core to the trust that consumers must have in 9-1-1 systems in order to rely upon them in times of great need, many of which are also times of great sensitivity.

NENA replies here to address a series of comments filed in response to this proceeding but addressed to technical issues beyond the scope of the NEAD privacy and security plan. Specifically, we wish to clarify certain

technical aspects of NEAD entry validation in both E9-1-1 and NG9-1-1 contexts.

Comments filed by the National States GIS Council (NSGIC) and its supporters argue that access should be provided to 9-1-1 entities and their authoritative GIS data providers for purposes analogous to current address validation, discrepancy reporting, and error resolution processes. It is at least implicit in the comments, however, that NSGIC seeks access to data beyond that which was contemplated at the time E9-1-1 and/or NG9-1-1 standards were developed, beyond that which was negotiated between NENA, APCO, and the four largest wireless carriers and included in the Commission's rules, and beyond that which was designed-in to the NEAD architecture. Although NENA agrees entirely with NSGIC that address data utilized for 9-1-1 purposes must be validated in advance of use, we are compelled to reaffirm our commitment to the standards, the agreement and rules, and the significant work that has already gone into architecting the NEAD.

In an E9-1-1 context, address data is validated against a tabular Master Street Address Guide (MSAG) which contains a listing of valid street names and associated street number ranges. Until a local 9-1-1 authority reaches a point in its transition to NG9-1-1 at which it deploys a GIS-based Location Validation Function (or shares one within a broader NG9-1-1 system), *the* source of validation data for all Access Network Providers (ANPs) will be the existing local MSAG. It is therefore appropriate for the NEAD operator to validate NEAD entries for such jurisdictions against the relevant tabular data, at least for now. Consequently, this is one basis for the development of the NEAD architecture. It is true that this will prevent the validation of certain sub-address elements such as floor, apartment, suite, or room, since those elements were not contemplated for collection or tabulation at the time MSAG databases were originally deployed. However, this limitation was foreseen.

Both the NENA-APCO-Carrier Agreement and the FCC's rules require that NEAD entries be validated, without requiring that validation take place using a specific data source. During the original negotiations around the Roadmap Agreement, the parties decided to omit a specific reference so that legacy, transitional, and NG9-1-1 systems could be accommodated. This flexible approach allows local 9-1-1 authorities to accept valid, address-based dispatchable location data with wireless calls before they have completed the population and deployment of their Geospatial Information Systems (GIS), Spatial Interfaces, and Location Validation Functions (LVF), and to do so with added confidence and granularity once they have.

Once a jurisdiction has deployed a GIS-based LVF, it will be incumbent upon the NEAD operator to validate new entries, and periodically re-validate existing entries, against that system, for addresses that fall within the LVF's jurisdictional coverage. As it does so, NSGIC is correct that some addresses are likely to fail validation based on changes in the built environment, or failure of the original NEAD candidate submitter to provide accurate or complete data. To the extent that NSGIC's comments are addressed to this issue, however, there is an existing, well-documented discrepancy reporting function in NG9-1-1 to combat it.[1] When an LVF query returns a response that the submitted civic location is invalid, a discrepancy report can be automatically generated by the querying system. These reports, taken in the aggregate (particularly where a bulk re-validation occurs) will meet the need described by NSGIC to use validation failures as one means to discover changes in

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[1] NENA: The 9-1-1 Association, *Detailed Functional and Interface Specifications for the NENA i3 Solution* 97,101-02 (Sep. 10, 2016) (*available at*: http://c.ymcdn.com/sites/www.nena.org/resource/resmgr/standards/NENA-STA-010.2_i3_Architectu.pdf).

the built environment that have not yet been incorporated into the underlying GIS.

NENA expects that the NEAD will be built in a standards-compliant manner, supporting both MSAG validation of addresses for E9-1-1 jurisdictions and LVF validation of addresses for NG9-1-1 jurisdictions, and for both MSAG and LVF discrepancy reporting. Each of these functions requires the disclosure of certain data for the completion of standard queries and reports. NENA does not read the NEAD Privacy and Security Plan to in any way constrain those required disclosures. To the extent that NSGIC's comments may seek access beyond those standard queries and reports, however, neither the architecture of the NEAD nor the Privacy and Security Plan would – or should – support such access. Moreover, such an expansion would likely require that the FCC reopen the indoor wireless location rules via a Further Notice of Proposed Rulemaking, which is not contemplated here.

CONCLUSION

The NEAD Privacy and Security Plan should be approved.

TELFORD E. FORGETY, III
Attorney

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